

REMARKS

Claims 1-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Garcia-Luna-Aceves (U.S. Patent Application Publication No. 2003/0101278) in view of Lachhiramka (“Switch Based Traffic Distribution for Web Server Farms”).

Claim 1 recites among other elements: “the IP router comprising: means for ending a connection ... and obtaining request information of a content requested by the client...; means for obtaining the content by connecting with the selected optimum server via a server side interface of the IP router located proximate to the ... client devices and via a network which interconnects the original server and the ... mirror devices; and means for transferring the obtained content to the client device by connecting to the client device via a client side interface of the IP router.”

GLA describes web routers 202 which refer the request for an object to a web cache 208 or content server 210. Web cache or content server transfers the requested object to the client. (Paragraph 82). The web server, contacted by the client, provides URL to the web router. The web router maps each URL to the address of a web cache or the content server that can optimally provide the information object to the client and returns the addresses to the web server. The web server provides this information to the client. The client retrieves the objects directly from the identified content holder. (Paragraph 86).

The Final Office Action appears to interpret the web router described in GLA as being as part of a content server, web server, or web cache. Because of such configuration GLA’s web router transfers the content to the client. (*See* Final Office Action, page 3, lines 10-19).

However, claim 1 recites “means for obtaining the content by connecting with the optimum server selected.” Based on the interpretation of GLA, the web router does not need to connect to the alleged optimum server, because it obtains the content from the server it is integrated with. Accordingly, the step of connecting is missing.

Additionally, claim 1 recites “means for selecting an optimum server for the request information.” However, based on the GLA’s interpretation, it follows that the alleged server, of which the web router is a part, is necessarily an optimum server (because this is where the content is transferred from). Accordingly, the step of selecting is missing.

Further, the Examiner concedes that the client device of GLA is connected to the network and, via the network, the client connects to the content server. (See Final Office Action, page 4, last paragraph).

Claim 1, as amended, recites “means for obtaining the content by connecting with the selected optimum server via a server side interface of the IP router located proximate to the ... client devices and via a network which interconnects the original server and the ... mirror devices; and means for transferring the obtained content to the client device by connecting to the client device via a client side interface of the IP router.”

GLA describes the web router 202 (the alleged IP router) connected to the client device via the web server and the network. The web cache 208 (the alleged mirror device) is connected to the web router 202. (See Fig. 2, Paragraph 78). Accordingly, the web router is not connected to the client via a client side interface and not located proximately the client devices. Further, the original server and the web caches are not interconnected by the network, but rather have point to point connections. GLA does not teach or suggest that a web router (the alleged IP router) has a client side interface to connect to the client and a server side interface to connect to the mirror devices which are interconnected by a network.

To the contrary, the amended claim 1 calls for the client devices to be not connected to the network. The router connects to the network and to the content server when the client device is disconnected from the router.

Accordingly, neither GLA, nor Lachhiramka, taken singularly or in combination, teaches or suggests at least the IP router comprising “means for selecting an optimum server for the request information...; means for obtaining the content by connecting with the selected optimum server via a server side interface of the IP router located proximate to the ... client devices and via a network which interconnects the original server and the ... mirror devices; and means for transferring the obtained content to the client device by connecting to the client device via a client side interface of the IP router.”

Therefore, it is respectfully submitted that **claim 1 and dependent claims 2-6** distinguish patentably and unobviously over GLA and Lachhiramka.

In addition, **claim 2** recites among other elements: “means for detecting a change in contents of the IP routing table;... means for altering a selection criteria of the optimum server based on a result of detecting that the network topology has been changed.”

Initially, based on the Examiner’s interpretation of GLA, there is no need “for altering a selection criteria of the optimum server based on a result of detecting that the network topology has been changed,” because a location of the alleged optimum server is already known.

Further, the Examiner asserts that the change must be detected in the table. (See Final Office Action, page 5, paragraph 2, last 3 lines).

GLA describes that the web routers communicate with one another via messages which carry the mappings specifying the association between clients and available servers. (Paragraph 73.) Therefore, the web routers find out about the change in topology from the messages.

There is no discussion in GLA about a routing table which is disposed in the web router. Further, it is unclear why the change must be detected in the table. GLA appears to describe that the change is detected from the messages.

Lachhiramka does not cure any deficiency of GLA.

Accordingly, **claim 2** distinguishes patentably and unobviously over GLA and Lachhiramka.

Claim 5 recites among other elements: “means for detecting a change in the IP routing table and performing a health check for obtaining the index information per server based on the detected change in the IP routing table.”

As discussed above, GLA does not teach or suggest means for detecting a change in the IP routing table. Further, GLA describes that the ALP module 308 reports distances to the WILD module 304, so that the WILD module 304 knows about unreachable anchor Web routers while determining validity of NL maps and WILD maps. (Paragraph 129.) GLA does not disclose that ALP module performs a health check in response to detecting a change in the routing table. ALP module of GLA provides the information on the regular basis and not dependent on the changes detected in the routing table.

Lachhiramka does not cure any deficiency of GLA.

Accordingly, **claim 5** distinguishes patentably and unobviously over GLA and Lachhiramka.

Claim 7 recites features similar to, although not necessarily coextensive with, the features argued above with respect to claim 1. Therefore, arguments presented with respect to claim 1 are respectfully submitted to apply with equal force here.

It is, therefore, respectfully submitted that **claim 7 and dependent claims 8-12** distinguish patentably and unobviously over GLA and Lachhiramka.

Claim 13 recites features similar to, although not necessarily coextensive with, the features argued above with respect to claim 1. Therefore, arguments presented with respect to claim 1 are respectfully submitted to apply with equal force here. It is, therefore, respectfully submitted that **claim 13 and dependent claims 14-17 and 20** distinguish patentably and unobviously over GLA and Lachhiramka.

Claim 18 recites features similar to, although not necessarily coextensive with, the features argued above with respect to claim 1. Therefore, arguments presented with respect to claim 1 are respectfully submitted to apply with equal force here. It is, therefore, respectfully submitted that **claim 18 and dependent claim 19** distinguish patentably and unobviously over GLA and Lachhiramka.

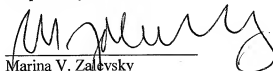
New claim 21 has been added to provide more varied protection, and is patentable at least by virtue of its dependency or for additional features set forth therein. No new subject matter has been added.

CONCLUSION

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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